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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

JJ ARCH LLC,

Debtor.¹

Chapter 11

Case No. 24-10381 (JPM)

**JARED CHASSEN'S JOINDER TO ARCH REAL ESTATE
HOLDINGS LLC'S OBJECTION TO THE DEBTOR'S MOTION
TO SET LAST DAY TO FILE PROOFS OF CLAIM**

Jared Chassen ("Chassen"), by and through the undersigned counsel, hereby files this joinder ("Joinder") to the objection [ECF No. 142] (the "Objection") filed by Arch Real Estate Holdings LLC ("AREH") in response to the Debtor's Motion to Set Last Day to File Proofs of Claim [ECF No. 130] ("Bar Date Motion"). In support of this Joinder and the Objection, Chassen represents and states as follows:

¹ The last four digits of the Debtor's federal tax identification number is 4251.

OBJECTION

1. Chassen agrees that the Bar Date Motion is currently unnecessary and potentially wasteful. This is particularly true in light of this Court's recent ruling concerning remand and the Debtor's own acknowledgement that the instant bankruptcy proceeding cannot meaningfully progress until the issues of governance are determined. Requiring all parties in interest to address their claims matters now is prejudicial to creditors and parties in interest who may well incur unnecessary expense.

2. At the meeting of creditors held on June 20, 2024 pursuant to 11 U.S.C. 341, Mr. Simpson failed to identify any contemplated exit strategy for the Debtor from this proceeding because none exists. Like AREH, Chassen has not consented to the Bankruptcy Court's final disposition and his right to a jury trial was one of the factors this Court found in favor of remand.

3. For the reasons stated herein and in the Objection, Chassen asserts that he should not be required to immediately choose whether to expend resources and whether to waive any rights at this stage of the proceeding.

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WHEREFORE, Chassen respectfully requests that the Court sustain the Objection, deny the Motion, and grant other relief as is just and proper.

Dated: New York, New York
June 20, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2024, a true and correct copy of the foregoing was served on all parties in interest by electronic transmission via the Court's ECF system to all parties authorized to receive electronic notice in this case as noted below.

VIA CM/ECF:

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